

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

NANCY R., pseudonymously,

Plaintiff,

v.

PLAZA HOTELS, LLC; STEVE KETTER;
MICHAEL WILEY; OKC AIRPORT ES, LLC;
LLC; ESH STRATEGIES FRANCHISE, LLC;
KAJAL HOSPITALITY, LLC; JALIYAN
HOSPITALITY, INC.; SUPER 8
WORLDWIDE, INC.; RAJ KRUPA HOTEL,
LLC; DAYS INN WORLDWIDE, INC.;
CHAND & SAAJ HOSPITALITY, INC.;
RAMADA WORLDWIDE, INC.; YASH
ENTERPRISES, INC.; HOWARD JOHNSON
INTERNATIONAL, INC.; NOOR HOTEL,
LLC; AMBICA, LLC; OM, LLC; INDRA,
LLC; and G6 HOSPITALITY
FRANCHISING, LLC,

Defendants.

Case No. CJ-2025-1850

FILED

DISTRICT COURT

OKLAHOMA COUNTY, OKLAHOMA

April 21, 2025 9:49 AM

RICK WARREN, COURT CLERK

Case Number CJ-2025-1850

DEFENDANT OKC AIRPORT ES, LLC'S ANSWER TO PLAINTIFF'S PETITION

COMES NOW, Defendant, OKC Airport ES, LLC ("OAE") by and for its Answer to Plaintiff's Petition. OAE generally denies any allegation of negligence, wrongdoing, or claim for damages. In response to the individual allegations, statements, and conclusions of fact and law asserted in Plaintiff's Petition, OAE specifically states as follows:

1. Paragraph 1 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegation and therefore denies the same and demands strict proof thereof.

EXHIBIT

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2. The allegations in Paragraph 2 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

3. The allegations in Paragraph 3 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

4. The allegations in Paragraph 4 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

5. In response to the allegations in Paragraph 5 of Plaintiff's Petition, OAE admits only that it is a Texas limited liability company and that it owned the hotel in 2021 and 2022. OAE denies that it operated the hotel on a day-to-day basis.

6. Paragraph 6 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE admits only that ESH Strategies Franchise, LLC was the franchisor of the hotel in 2021 and 2022, and to the existence of the franchisor's brand standards for the hotel in that time frame. OAE is without sufficient information to admit or deny the remaining allegations and therefore denies the same.

7. The allegations in Paragraph 7 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

8. The allegations in Paragraph 8 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

9. The allegations in Paragraph 9 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

10. The allegations in Paragraph 10 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

11. The allegations in Paragraph 11 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

12. The allegations in Paragraph 12 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

13. The allegations in Paragraph 13 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

14. The allegations in Paragraph 14 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

15. The allegations in Paragraph 15 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

16. The allegations in Paragraph 16 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

17. The allegations in Paragraph 17 of Plaintiff's Petition do not pertain to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

18. The statements in Paragraph 18 of Plaintiff's Petition require no response. OAE denies any claim of liability, negligence, wrongdoing, or damages.

19. OAE is without sufficient information to admit or deny the allegations in Paragraph 19 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

20. Paragraph 20 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

21. Paragraph 21 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

22. Paragraph 22 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

23. Paragraph 23 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

24. Paragraph 24 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

25. Paragraph 25 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

26. Paragraph 26 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

27. Paragraph 27 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

28. Paragraph 28 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

29. Paragraph 29 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

30. Paragraph 30 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

31. Paragraph 31 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

32. Paragraph 32 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

33. Paragraph 33 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

34. Paragraph 34 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

35. Paragraph 35 of Plaintiff's Petition makes no allegation as to OAE and sets forth legal conclusions only, thus no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

36. Paragraph 36 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

37. Paragraph 37 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit

or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

38. Paragraph 38 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

39. Paragraph 39 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

40. Paragraph 40 of Plaintiff's Petition makes no allegation as to OAE and sets forth legal conclusions, thus no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

41. Paragraph 41 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

42. Paragraph 42 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

43. Paragraph 43 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

44. Paragraph 44 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

45. Paragraph 45 of Plaintiff's Petition makes no allegation as to OAE and sets forth legal conclusions only, thus no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

46. Paragraph 46 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

47. Paragraph 47 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

48. Paragraph 48 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

49. Paragraph 49 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

50. Paragraph 50 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

51. Paragraph 51 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

52. Paragraph 52 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

53. Paragraph 53 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

54. Paragraph 54 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

55. Paragraph 55 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

56. Paragraph 56 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

57. In response to Paragraph 57 of Plaintiff's Petition, OAE is without sufficient information to admit or deny the allegation and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

58. Paragraph 58 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, the allegation in Paragraph 58 of Plaintiff's Petition is denied. OAE denies any claim of liability, negligence, wrongdoing, or damages.

59. Paragraph 59 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

60. Paragraph 60 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

61. Paragraph 61 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

62. Paragraph 62 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

63. In response to Paragraph 63 of Plaintiff's Petition, OAE is without sufficient information to admit or deny the allegation and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

64. In response to Paragraph 64 of Plaintiff's Petition, OAE is without sufficient information to admit or deny the allegation and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

65. Paragraph 65 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

66. Paragraph 66 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

67. Paragraph 67 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, the allegations are denied. OAE denies any claim of liability, negligence, wrongdoing, or damages.

68. Paragraph 68 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

69. Paragraph 69 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, the allegations are denied. OAE denies any claim of liability, negligence, wrongdoing, or damages.

70. Paragraph 70 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, the allegations are denied. OAE denies any claim of liability, negligence, wrongdoing, or damages.

71. Paragraph 71 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

72. Paragraph 72 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

73. Paragraph 73 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

74. Paragraph 74 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

75. Paragraph 75 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

76. Paragraph 76 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

77. Paragraph 77 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

78. Paragraph 78 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

79. The allegations in Paragraph 79 of Plaintiff's Petition are denied.

80. The allegations in Paragraph 80 of Plaintiff's Petition are denied.

81. Paragraph 81 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

82. Paragraph 82 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

83. Paragraph 83 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

84. The allegations in Paragraph 84 of Plaintiff's Petition are denied.

85. The allegations in Paragraph 85 of Plaintiff's Petition are denied.

86. OAE is without sufficient information to admit or deny the allegations in Paragraph 86 of Plaintiff's Petition and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

87. The allegations in Paragraph 87 of Plaintiff's Petition are denied.

88. The allegations in Paragraph 88 of Plaintiff's Petition are denied.

89. Paragraph 89 of Plaintiff's Petition makes no allegation as to OAE and sets forth legal conclusions only, thus no response is required. To the extent a response is required, the allegations are denied. OAE denies any claim of liability, negligence, wrongdoing, or damages.

90. The allegations in Paragraph 90 of Plaintiff's Petition are denied.

91. The allegations in Paragraph 91 of Plaintiff's Petition are denied.

92. The allegations in Paragraph 92 of Plaintiff's Petition are denied.

93. The allegations in Paragraph 93 of Plaintiff's Petition are denied.

94. The allegations in Paragraph 94 of Plaintiff's Petition are denied.

95. The allegations in Paragraph 95 of Plaintiff's Petition are denied.

96. Paragraph 96 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

97. Paragraph 97 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

98. Paragraph 98 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

99. Paragraph 99 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

100. Paragraph 100 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

101. Paragraph 101 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

102. Paragraph 102 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

103. Paragraph 103 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

104. Paragraph 104 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

105. Paragraph 105 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

106. Paragraph 106 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

107. The allegations in Paragraph 107 of Plaintiff's Petition are denied.

108. The allegations in Paragraph 108 of Plaintiff's Petition are denied.

109. The allegations in Paragraph 109 of Plaintiff's Petition are denied.

110. The allegations in Paragraph 110 of Plaintiff's Petition are denied.

111. The allegations in Paragraph 111 of Plaintiff's Petition are denied.

112. The allegations in Paragraph 112 of Plaintiff's Petition are denied.

113. OAE is without sufficient information to admit or deny the allegations in Paragraph 113 of Plaintiff's Petition and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

114. The allegations in Paragraph 114 of Plaintiff's Petition are denied.

115. The allegations in Paragraph 115 of Plaintiff's Petition are denied.

116. OAE is without sufficient information to admit or deny the allegations in Paragraph 116 of Plaintiff's Petition and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

117. Paragraph 117 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

118. Paragraph 118 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

119. The allegations in Paragraph 119 of Plaintiff's Petition are denied.

120. The allegations in Paragraph 120 of Plaintiff's Petition are denied.

121. The allegations in Paragraph 121 of Plaintiff's Petition are denied.

122. The allegations in Paragraph 122 of Plaintiff's Petition are denied.

123. The allegations in Paragraph 123 of Plaintiff's Petition are denied.

124. The allegations in Paragraph 124 of Plaintiff's Petition are denied.

125. Paragraph 125 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

126. Paragraph 126 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

127. Paragraph 127 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

128. Paragraph 128 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

129. Paragraph 129 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

130. Paragraph 130 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

131. Paragraph 131 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

132. Paragraph 132 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

133. Paragraph 133 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

134. Paragraph 134 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

135. Paragraph 135 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

136. Paragraph 136 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

137. Paragraph 137 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

138. Paragraph 138 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

139. Paragraph 139 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

140. Paragraph 140 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

141. Paragraph 141 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

142. Paragraph 142 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

143. Paragraph 143 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

144. Paragraph 144 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

145. Paragraph 145 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

146. Paragraph 146 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

147. Paragraph 147 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

148. Paragraph 148 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

149. Paragraph 149 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

150. Paragraph 150 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

151. Paragraph 151 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

152. Paragraph 152 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

153. Paragraph 153 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

154. Paragraph 154 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

155. Paragraph 155 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

156. Paragraph 156 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

157. Paragraph 157 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

158. Paragraph 158 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

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160. Paragraph 160 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

161. Paragraph 161 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

162. Paragraph 162 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

163. Paragraph 163 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

164. Paragraph 164 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

165. Paragraph 165 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

166. Paragraph 166 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

167. Paragraph 167 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

168. Paragraph 168 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

169. Paragraph 169 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

170. Paragraph 170 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

171. Paragraph 171 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

172. Paragraph 172 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

173. Paragraph 173 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

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176. Paragraph 176 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

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181. Paragraph 181 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

182. Paragraph 182 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

183. Paragraph 183 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

184. Paragraph 184 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

185. Paragraph 185 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

186. Paragraph 186 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

187. Paragraph 187 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

188. Paragraph 188 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

189. The statement in Paragraph 189 of Plaintiff's Petition requires no response. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

190. OAE is without sufficient information to admit or deny the allegations in Paragraph 190 of Plaintiff's Petition and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

191. OAE is without sufficient information to admit or deny the allegations in Paragraph 191 of Plaintiff's Petition and therefore denies the same and demands strict proof thereof. OAE denies any claim of liability, negligence, wrongdoing, or damages.

192. Paragraph 192 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

193. Paragraph 193 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

194. Paragraph 194 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

195. Paragraph 195 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

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197. Paragraph 197 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

198. Paragraph 198 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

199. Paragraph 199 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

200. Paragraph 200 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

201. Paragraph 201 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations and therefore denies the same.

202. The allegations in Paragraph 202 of Plaintiff's Petition are denied.

203. The allegations in Paragraph 203 of Plaintiff's Petition are denied.

204. Paragraph 204 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, the allegations are denied as stated.

205. OAE is without sufficient information to admit or deny the allegations in Paragraph 205 of Plaintiff's Petition and therefore denies the same.

206. OAE is without sufficient information to admit or deny the allegations in Paragraph 206 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

207. Paragraph 207 of Plaintiff's Petition makes no allegation as to OAE and no response is required. To the extent a response is required, OAE is without sufficient information to admit or deny the allegations in Paragraph 207 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

208. OAE is without sufficient information to admit or deny the allegations in Paragraph 208 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

209. OAE is without sufficient information to admit or deny the allegations in Paragraph 209 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

210. OAE is without sufficient information to admit or deny the allegations in Paragraph 210 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

211. OAE is without sufficient information to admit or deny the allegations in Paragraph 211 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

212. OAE is without sufficient information to admit or deny the allegations in Paragraph 212 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

213. OAE is without sufficient information to admit or deny the allegations in Paragraph 213 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

214. OAE is without sufficient information to admit or deny the allegations in Paragraph 214 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

215. OAE is without sufficient information to admit or deny the allegations in Paragraph 215 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

216. OAE is without sufficient information to admit or deny the allegations in Paragraph 216 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

217. OAE is without sufficient information to admit or deny the allegations in Paragraph 217 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

218. OAE is without sufficient information to admit or deny the allegations in Paragraph 218 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

219. OAE is without sufficient information to admit or deny the allegations in Paragraph 219 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

220. OAE is without sufficient information to admit or deny the allegations in Paragraph 220 of Plaintiff's Petition and therefore denies the same. OAE denies any claim of liability, negligence, wrongdoing, or damages.

221. The allegations in Paragraph 221 of Plaintiff's Petition are denied.

222. The statement in Paragraph 222 of Plaintiff's Petition requires no response.

223. Paragraph 223 of Plaintiff's Petition sets forth a legal conclusion only and no response is required. To the extent a response is required, the allegation is denied. OAE denies any claim of liability, negligence, wrongdoing, or damages.

224. The allegations in Paragraph 224 of Plaintiff's Petition are denied.

225. The allegations in Paragraph 225 of Plaintiff's Petition are denied.

226. The allegations in Paragraph 226 of Plaintiff's Petition are denied.

227. The allegations in Paragraph 227 of Plaintiff's Petition are denied.

228. The statement in Paragraph 228 of Plaintiff's Petition requires no response.

229. Paragraph 229 of Plaintiff's Petition sets forth a legal conclusion only and no response is required. To the extent a response is required, the allegation is denied. OAE denies any claim of liability, negligence, wrongdoing, or damages.

230. The allegations in Paragraph 230 of Plaintiff's Petition are denied.

231. The allegations in Paragraph 231 of Plaintiff's Petition are denied.

232. Paragraph 232 of Plaintiff's Petition sets forth a legal conclusion only and no response is required. To the extent a response is required, the allegation is denied. OAE denies any claim of liability, negligence, wrongdoing, or damages.

233. The statement in Paragraph 233 of Plaintiff's Petition requires no response.

234. Paragraph 234 of Plaintiff's Petition sets forth legal conclusions only and no response is required. To the extent a response is required, the allegations are denied. OAE denies any claim of liability, negligence, wrongdoing, or damages.

235. The allegations in Paragraph 235 of Plaintiff's Petition are denied.

236. The allegations in Paragraph 236 of Plaintiff's Petition are denied.

237. The statement in Paragraph 237 of Plaintiff's Petition requires no response.

238. The allegations in Paragraph 238 of Plaintiff's Petition are denied.

239. The allegations in Paragraph 239 of Plaintiff's Petition are denied.

AFFIRMATIVE DEFENSES

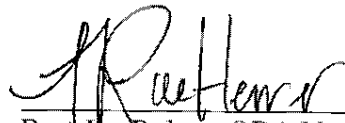
1. Failure to state a claim upon which relief can be granted.
2. Statute of Limitations.
3. Improper Venue.
4. Lack of Jurisdiction.
5. Contributory/Comparative Negligence.
6. Assumption of the Risk.
7. Trespassing.
8. Absence of Duty.
9. Consent.
10. Open and Obvious Condition.

11. Lack of Knowledge.
12. Lack of Notice.
13. Absence of Venture.
14. Failure to Mitigate.
15. Superseding and/or Intervening Cause.
16. Absence of Intentional, Outrageous, and/or Reckless Conduct.
17. Illegality.
18. Unclean Hands.
19. Equitable Estoppel.
20. Laches.
21. Liability and/or criminal activity of third parties over whom OAE had no control.
22. Plaintiff's damages, if any, were caused, in whole or in part, by the actions and/or omissions of Plaintiff.
23. OAE specifically denies the existence of a defect/dangerous condition in the premises.
24. The statutes sued upon are unconstitutionally vague and ambiguous.
25. Plaintiff's medical special damages, if any, are limited to the amount of special damages actually incurred, consistent with 12 O.S. § 3009.1.
26. Any award of punitive damages would violate OAE's due process and equal protection rights under the Fourteenth Amendment of the United States Constitution and Article II § 7 of the Oklahoma Constitution, and would be improper under the common law and public policies of the State of Oklahoma.

27. OAE reserves the right to amend its Answer and/or add additional affirmative defenses as discovery is ongoing.

WHEREFORE, OAE demands Plaintiff take nothing by way of her Petition, and respectfully requests the Court grant its attorneys' fees and costs, as permitted under Oklahoma law.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "AR Herren", is written over a horizontal line.

Bart Jay Robey, OBA No. 19926
Eric A. Moen, OBA No. 31155
Abby R. Herren, OBA No. 33528
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**ATTORNEYS FOR DEFENDANT, OKC
AIRPORT ES, LLC**

CERTIFICATE OF SERVICE

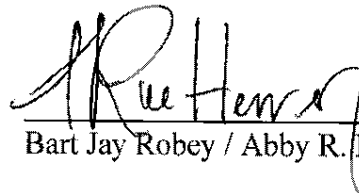
I hereby certify that on the 21st day of April, 2025, a true and correct copy of the foregoing was mailed with proper postage thereon prepaid to:

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